

Ohio Southern District

~~IN THE COURT OF COMMON PLEAS~~
~~BUTLER COUNTY, OHIO~~

IN RE:

~~WILLIAM CHARLES DUNN~~, Petitioner,
by and through his Guardian / Next Friend,
LINDSEY-MORGAN; TAYLOR, Non-Domestic
c/o 5830 Reigart Road, Fairfield Township, Ohio [45011]

R. Lindsey Taylor

Case No. CR 2024 06 0909

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS

GROUNDS

1. The case against Petitioner was previously terminated with **final dismissal codes**; extinguishing all bond obligations and ending the court's jurisdiction.
2. Despite dismissal, the docket reflects new hearing dates "per attorney request," though Petitioner's appointed counsel has formally withdrawn. Petitioner has no attorney and has not requested further settings.
3. A *capias* has been issued and Petitioner has been pursued by bail agents and law enforcement without a lawful open case, summons, or service of process. Orders entered after dismissal are *void ab initio*.
4. **Fraud Upon the Court** – By recording hearings "per attorney request" after counsel's withdrawal, and issuing a *capias* on a case already dismissed with final codes, the Court itself has engaged in fraud upon the court. Fraud on the court nullifies jurisdiction and renders all resulting orders void.
5. **Coercion to Force Bail Bond** – Petitioner has been threatened with re-arrest and compelled toward entering a new bail bond. Such coercion attempts to manufacture jurisdiction and impose obligations where none lawfully exist. Coerced bail after dismissal constitutes duress, racketeering, and a violation of Petitioner's constitutional rights under the Fifth, Sixth, and Fourteenth Amendments.
6. **Violation of the Law of Armed Conflict** – By issuing a *capias* on a closed case and directing armed agents to pursue Petitioner with false "violent" designations, the Court and its agents have engaged in hostile actions beyond lawful authority. Such actions breach fiduciary trust and are prohibited under the Law of Armed Conflict, U.S. treaty obligations, and both the Ohio and United States Constitutions.
7. These acts amount not to due process but to **kidnapping under color of law**, placing Petitioner and his family in immediate danger.

RELIEF REQUESTED

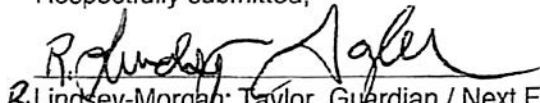
Petitioner respectfully demands:

- Immediate issuance of a writ of habeas corpus;
- Quashing of any and all capias or warrants issued after dismissal;
- Recognition that the bail bond contract was extinguished upon final dismissal;
- Removal of false attorney entries from the record;
- Immediate release from all unlawful restraint and supervision;
- For the Court's convenience, Petitioner submits a **Proposed Order Recalling Capias** for signature;
- Any further relief this Court deems just and proper.

EXHIBITS

- Exhibit A – Certified Docket Entries showing vacated trials and false re-entry after dismissal.
Exhibit B – Sheriff's Trust Stub showing estate administration.
Exhibit C – Proposed Order: Entry Recalling Capias (submitted for Court's convenience).

Respectfully submitted,


R. Lindsey-Morgan; Taylor, Guardian / Next Friend
Date: September 19, 2025

RESTRAINING ORDER & DEMAND NOTICE

September 23, 2025

To:

Sheriff Richard K. Jones, Butler County Sheriff's Office
All Public Officials of Butler County, Ohio
All Officers, Agents, and Employees Operating Under Color of Law

Be advised: subsequent to the filing of the **Habeas Corpus Petition** and **Recall of Capias** (Case No. 1:25-CV-691), my home was unlawfully raided. This is a direct violation of constitutional protections and requires **IMMEDIATE** corrective action.

I hereby give notice of a standing **RESTRAINING ORDER** against any further unlawful entry, seizure of property, harassment, or detainment of myself or my household. No further action may be taken without valid judicial authority.

Violations Include: Second Amendment, Fourth Amendment, Article I §14 Ohio Constitution, and due process rights under the Fifth and Fourteenth Amendments.

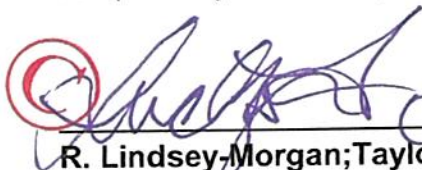
Return of Property: All firearms, documents, and effects unlawfully seized must be **immediately returned**. Ongoing possession is theft and unlawful taking.

Accounting: The raid and seizure are unauthorized debits against my rights and estate. These must be reversed in full.

Evidence of Claim: If any party alleges injury caused by me, R. Lindsey-Morgan;Taylor, let them come forward now with verified affidavit. Absent such claim, all proceedings must cease.

© 2025 R. Lindsey-Morgan;Taylor. All rights reserved.

Respectfully submitted,



R. Lindsey-Morgan;Taylor
Guardian / Champion / Secured Party
Non-Domestic



COURT OF COMMON PLEAS
CRIMINAL DIVISION
BUTLER COUNTY, OHIO

STATE OF OHIO : CASE NO.: CR 2024 06 0909
Plaintiff, :
 : JUDGE: MUENCH-MCELFRESH
-vs- :
 :
WILLIAM DUNN : MOTION TO WITHDRAW
Defendant. : AS COUNSEL OF RECORD

Now comes Arica Underwood and hereby respectfully requests permission to withdraw as counsel in the above matter. Mr. Dunn has sent an email titled Formal Notice of Unlawful Proceedings. Counsel believes that this creates a conflict for counsel.

Respectfully submitted,

/s/ Arica L. Underwood

Arica L. Underwood (#0067664)
Law Office of Arica L. Underwood LLC
1831 West Galbraith Road
Cincinnati, Ohio 45239
Phone: 513-772-6878
Fax: 513-586-1080
attorneyaricaunderwood@gmail.com

Ex A

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this Motion to Withdraw as Counsel of Record was served on the Butler County Prosecuting Attorney by way of electronic mail service at prosecutor@butlercountyoohio.org.

I hereby certify that this Motion to Withdraw as Counsel was served on William Dunn in person on August 28, 2025, as well as by electronic mail service on the date of filing.

/s/ Arica Underwood

Arica L. Underwood (#0067664)

Ex A

Formal Notice – Unlawful Proceedings, Breach of Duty, and Personal Liability

From: William Dunn (bcdunn513@gmail.com)

To: attorneyaricaunderwood@gmail.com

Date: Thursday, August 14, 2025 at 09:33 AM EDT

Erika,

This is to place you on notice that the actions recently taken to place William-Charles; Dunn back on the docket were unlawful and void ab initio. No lawful summons, written order, or due process was served. Instead, a verbal statement from you — that you "ran into the prosecutor" who said he wanted him back on the docket — was used as the basis for a setting.

This is not consent, authority, or lawful cause.

You are now on record for the following violations:

1. Fraud and manipulation of the record – Using "final dismissal" docket codes to close the case in order to subvert the Appeals Court process, then attempting to reopen without jurisdiction.
2. Fruit from the poisonous tree – All further proceedings are tainted, and any evidence, orders, or warrants derived therefrom are void.
3. Dishonor of lawful instruments – Previous properly tendered bonds and documents were rejected without cause.
4. Kidnapping / unlawful seizure of person – Attempting to compel appearance without lawful process.
5. Jones Act and seaman protections – You are acting in an administrative capacity over a private estate without lawful commission, equivalent to unlawful maritime salvage.
6. Involuntary servitude – Attempting to compel compliance, labor, or attendance under threat, duress, or coercion.

EXH

7. Collection of bodily fluids without cause – Unlawfully conditioning pretrial liberty upon medical or bodily extractions.
8. Acting under color of law without authority – Violating established constitutional, statutory, and treaty obligations.
9. Violation of the Laws of War – Engaging in acts that breach lawful trust and contractual bounds under the applicable law of armed conflict.
10. Violation of UCC and constitutional timelines – It has been over one (1) year since the initial indictment with no lawful progression to trial. This violates commercial timeliness under the Uniform Commercial Code as well as constitutional guarantees to a speedy trial.
11. Right against self-incrimination – Repeated attempts to force a plea and compel testimony against himself, in violation of the Fifth Amendment and related protections.

Your actions, along with any state actor or agent involved, are rejected in all forms. Any continued pursuit will result in personal and private liability, enforceable without further notice.

Since You are operating on behalf of the state working with colleagues like the prosecutor judge and pre-trial services. The state is fully put on notice via this email.

Wager: Up the Ante

Memo: Hazardous inconvenience

William-Charles; Dunn

By: Lindsey-Morgan:Taylor Tutor, Champion, Secured Party, Private Citizen, Ambassador of Jesus Christ, Mother, Daughter, Living Woman, Non-Domestic

P.S. on a personal human to human level is brokering lives of your brothers and sisters where you want to be when Jesus comes back?

EXHIBIT A

<u>Date/Time</u>	<u>Location</u>	<u>Type</u>	<u>Result</u>	<u>Event Judge</u>
09/09/2024 01:30 PM	General Division Court, GSC 3rd Floor, Courtroom B	ARRAIGNMENT HEARING		Muench-McElfresh, Honorable Jennifer
09/13/2024 09:30 AM	General Division Court, GSC 3rd Floor, Courtroom B	ARRAIGNMENT HEARING		Muench-McElfresh, Honorable Jennifer
09/26/2024 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	ARRAIGNMENT HEARING		Muench-McElfresh, Honorable Jennifer
10/03/2024 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
10/17/2024 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
10/24/2024 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
12/02/2024 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
01/16/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
02/20/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
04/04/2025 09:30 AM	General Division Court, GSC 3rd Floor, Courtroom B	MOTION		Muench-McElfresh, Honorable Jennifer
04/21/2025 09:00 AM	General Division Court, GSC 3rd Floor, Courtroom B	MOTION		Muench-McElfresh, Honorable Jennifer
04/21/2025 09:00 AM	General Division Court, GSC 3rd Floor, Courtroom B	JURY TRIAL	VACATED	Muench-McElfresh, Honorable Jennifer
05/27/2025 09:00 AM	General Division Court, GSC 3rd Floor, Courtroom B	JURY TRIAL	VACATED	Muench-McElfresh, Honorable Jennifer
08/21/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING	VACATED	Muench-McElfresh, Honorable Jennifer
08/28/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
10/02/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	PLEA OR TRIAL SETTING		Muench-McElfresh, Honorable Jennifer
11/06/2025 01:00 PM	General Division Court, GSC 3rd Floor, Courtroom B	ADJUDICATION HEARING		Muench-McElfresh, Honorable Jennifer

Exhibit B

33646

Inmate ID: 125093

Account Name: Trust for DUNN, WILLIAM

Date: April 07, 2025

Timestamp: 4/7/2025 9:28:58 AM

Amount: 9.00

Memo: RELEASED FROM GPS

Payee: WILLIAM CHARLES DUNN

Exhibit B

EXHIBIT C

FILED
MARY L. SWAIN
BUTLER COUNTY
CLERK OF COURTS
09/19/2025 10:14 AM

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

STATE OF OHIO

Plaintiff

VS.

WILLIAM DUNN
Defendant(s)

Case No. CR 24 06 0909 2024 06 0909

Judge MCElfresh

PRETRIAL ORDER

This matter came before this Court this 19th day of September, 2025

and the following orders and deadlines were established, and shall be the order of the Court:

X PLEA or TRIAL SETTING is set for 10.2.25 at 1:00 p. m.

DISPOSITION is set for _____ at _____ m.

TRIAL is to commence on _____ at _____ m.

MOTION _____ shall be filed by _____

and shall be heard on _____ at _____ m.

OTHER HEARING is set for _____ at _____ m.

BILL OF PARTICULARS

Defendant's motion to be filed by _____

Prosecutor's response to be filed by _____

DISCOVERY

Defendant's motion to be filed by _____

Prosecutor's response to be filed by _____

Prosecutor's motion to be filed by _____

Defendant's response to be filed by _____

BOND IS REVOKED/SET _____

CAPIAS TO ISSUE _____

Who?
A picked up on capias. Next hearing scheduled
on date requested by A's attorney.

SO ORDERED:

Defense Counsel

Who?
Judge

Defendant

Prosecutor

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

THE STATE OF OHIO
Plaintiff

CASE NO. CR 24 06 0909

-VS-

WILLIAM DUNN
Defendant

ENTRY RECALLING CAPIAS

For good cause shown, and the Court being fully advised in the Premises, the
Capias previously issued is hereby recalled.

Judge

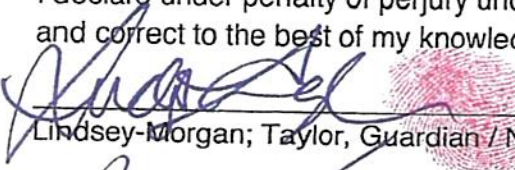
AFFIDAVIT OF FACTS — EXHIBIT D BUTLER COUNTY COMMON PLEAS COURT

I, Lindsey-Morgan; Taylor, acting as Guardian / Next Friend for William Charles Dunn, being of sound mind and over the age of 18, hereby state the following facts based on my personal knowledge:

1. On or about September 18–19, 2025, at approximately 12:30 a.m., I was called to pick up William Charles Dunn from a hotel where he had been confronted by two bail bondsmen accompanied by Sharonville police officer Burke.
2. During this encounter, I asked the bondsmen directly how they knew where William was staying. They did not provide an explanation.
3. I informed the bondsmen and Officer Burke that this matter is moving forward as a military tribunal and that their actions would be reviewed as part of that proceeding.
4. I asked the first bondsman: "If William refused to go with you, would you force him to go?" The bondsman responded, "Yeah." I then asked, "So with force, yes?" The bondsman affirmed. I acknowledged his response by saying, "OK. I just wanted to make sure of that."
5. I then informed the first bondsman and Officer Burke that I would now have to include them as parties in future proceedings and filings related to this matter.
6. While William was in the back of the bail agents' truck, he observed a file that contained documents referencing his bank, U.S. Bank, and his company, Home Solutions. This demonstrates that bail agents and enforcement officers were in possession of commercial banking and business records unrelated to any alleged criminal charges.
7. The possession and use of such financial and business records during a purported bond enforcement action shows unlawful coordination between commercial banking institutions, bail agents, and county enforcement officers, consistent with the administration of William's estate as a commercial account rather than lawful due process in a criminal case.
8. These facts support Petitioner's claim that ongoing detention and attempted re-bail constitute fraud, coercion, kidnapping under color of law, and racketeering activity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Date: 9-19-25


Lindsey-Morgan; Taylor, Guardian / Next Friend

NOTARY ACKNOWLEDGMENT

State of Ohio, County of Butler

Subscribed and sworn before me on this _____ day of _____, 2025, by Lindsey-Morgan; Taylor.

Notary Public

Lindsey-Morgan;Taylor
Non-Domestic
c/o 5830 Reigart Road
Hamilton, Ohio 45011

September 23, 2025

Sheriff Richard K. Jones
Butler County Sheriff's Office
705 Hanover Street
Hamilton, OH 45011

Re: Service of Habeas Corpus Petition & Recall of Capias
Case No.: 1:25-CV-691, U.S. District Court, Southern District of Ohio
In the Matter of: [Full Name of Detainee, Booking Number if known]

Dear Sheriff Jones,

Enclosed please find a copy of the **Petition for Writ of Habeas Corpus** together with the **Recall of Capias**, filed under the above-referenced case number. These filings are served upon your office to provide notice and to require compliance with applicable law.

Copies are directed to all known Butler County detention facilities, including but not limited to:

- Butler County Jail, 705 Hanover Street, Hamilton, OH 45011
- Resolutions / Treatment Facility, 442 S. 2nd Street, Hamilton, OH 45011
- Butler County Sheriff's Court Services / Holding, 123 Court Street, Hamilton, OH 45011
- Any other site of custody under the Sheriff's jurisdiction

Explanation of Recall of Capias:

The Recall of Capias withdraws the judicial command authorizing detention. Once recalled, detention under that capias is no longer lawful. See Ohio Rev. Code §§ 2725.01 et seq. (habeas corpus procedures), Article I, § 8 of the Ohio Constitution, and the Fifth and Fourteenth Amendments to the U.S. Constitution.

Other Grounds for Habeas Relief:

The Petition for Writ of Habeas Corpus further asserts multiple independent causes warranting release, including but not limited to:

- **Lack of jurisdiction and due process violations**, where detention is maintained without proper judicial authority.
- **Case dismissal and closure**, with the underlying case marked final and dismissed (Code 14 — unavailability), eliminating the basis for continued custody.
- **Unlawful restraint under color of law**, where agencies or officers attempt to maintain custody absent lawful process.
- **Constitutional violations**, including infringements on liberty interests protected by the Ohio and United States Constitutions.

Taken together, the Recall of Capias and the Habeas Corpus Petition remove any lawful basis for continued custody in this matter.

I, Lindsey-Morgan;Taylor, in the capacity of Guardian, Champion, and Secured Party, hereby **demand immediate release** of the above-named individual, unless other valid, lawful holds exist.

You are required to transmit these materials promptly to intake, records, and facility commanders at each Butler County detention location.

Respectfully submitted,


Lindsey-Morgan;Taylor
Guardian / Champion / Secured Party

Enclosures:

- Petition for Writ of Habeas Corpus (Case No. 1:25-CV-691)
- Recall of Capias (same case)

CC:

- Butler County Jail Administration
- Resolutions / Treatment Facility Director
- Court Services Division, 123 Court Street
- Clerk of Courts (for record)

CERTIFICATE OF SERVICE

I, Lindsey-Morgan;Taylor, Non-Domestic, Guardian, Champion, and Secured Party, hereby certify that on this 23rd day of September, 2025, I caused a true and correct copy of the **Petition for Writ of Habeas Corpus and Recall of Capias** (Case No. 1:25-CV-691, U.S. District Court, Southern District of Ohio) together with the accompanying cover letter to be served by Certified Mail, return receipt requested, upon:

- Sheriff Richard K. Jones, Butler County Sheriff's Office, 705 Hanover Street, Hamilton, OH 45011
- Butler County Jail Administration, 705 Hanover Street, Hamilton, OH 45011
- Resolutions / Treatment Facility Director, 442 S. 2nd Street, Hamilton, OH 45011
- Court Services Division, 123 Court Street, Hamilton, OH 45011
- Clerk of Courts, Butler County Courthouse, 101 High Street, Hamilton, OH 45011

and any other Butler County detention site under the Sheriff's jurisdiction.

I further certify that I have retained proof of mailing for my records.

Respectfully submitted,

 9/24/25

Lindsey-Morgan;Taylor

Non-Domestic

Guardian / Champion / Secured Party

c/o 5830 Reigart Road

Hamilton, Ohio 45011

Certified Mail Tracking Numbers (Green Cards / Receipts Attached):

- Sheriff Richard K. Jones – # 9589 0710 5270 0728 9823 67
- Butler County Jail Administration – # 9589 0710 5270 0728 9823 02
- Resolutions Facility – # 9589 0710 5270 0728 9713 75
- Court Services Division – # 123 - Court St. COPY
- Clerk of Courts – # 9589 0710 5270 0728 9715 11

Court Services
Division

Lindsey-Morgan;Taylor
Non-Domestic
c/o 5830 Reigart Road
Hamilton, Ohio 45011

September 23, 2025

To:

Nancy Nix, Butler County Treasurer / Auditor
130 High Street, 3rd Floor
Hamilton, OH 45011

And To:

U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Re: Recall of Capias, Habeas Petition, and FOIA Request for Surety Bonds

Case No.: 1:25-CV-691, U.S. District Court, Southern District of Ohio

In the Matter of: [Full Name of Detainee, Booking Number if known]

Dear Treasurer Nix and Officials of the United States Treasury,

Enclosed for your awareness and record is notice of the **Recall of Capias** issued in connection with the above-referenced matter. The Recall functions as the withdrawal of judicial authority to detain, and thus extinguishes the basis for custody under that instrument.

Additionally, I draw your attention to the **Petition for Writ of Habeas Corpus** filed under Case No. 1:25-CV-691, which sets forth further independent grounds for release, including:

- **Dismissal of the underlying case** (marked closed with dismissal code 14, unavailability).
- **Jurisdictional and due process violations** arising from detention absent lawful process.
- **Unlawful restraint under color of law**, maintained without valid court authority.
- **Constitutional infringements** contrary to the Ohio and U.S. Constitutions.

As Treasurer/Auditor, and as officials of the U.S. Treasury, you are placed on notice of these filings, as they implicate the administration of public funds, bonding obligations, and liability for wrongful detention.

FOIA / Public Records Request:

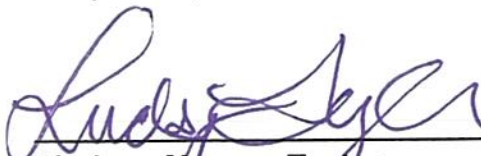
Pursuant to applicable state and federal public records laws, I hereby demand certified copies of the **surety bonds, oaths, and liability insurance instruments** for the following public officials:

- Sheriff Richard K. Jones, Butler County, Ohio
- Judge Jennifer-Munich McElfresh, Butler County Common Pleas Court
- Clerk Mary Swain, Butler County Clerk of Courts
- Prosecutor Brad Burgess, Butler County Prosecutor's Office

This request is made for purposes of transparency and to establish accountability of bonded officers acting under color of law. Please provide copies or certified verification within the statutory time frame.

I, Lindsey-Morgan;Taylor, in the capacity of Guardian, Champion, and Secured Party, place all parties on notice of the foregoing and **demand immediate release** of the above-named individual, absent other lawful cause.

Respectfully submitted,



Lindsey-Morgan;Taylor
Guardian / Champion / Secured Party